

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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*Counsel for John Lymn*

In Re:

BlockFi Inc.

Debtor.

Chapter 11

Case No. 22-19361 – MBK

Judge Michael B. Kaplan, Chief

**NOTICE OF APPEARANCE AND DEMAND FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that Mark E. Hall, Esq., counsel for John Lymn, hereby demands that all notices and all papers served or required to be served in the Debtor's chapter 11 case be served on the following:

Mark E. Hall, Esq.  
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**PLEASE TAKE FURTHER NOTICE** that this request for notice includes all notices and papers referred to in Federal Rule of Bankruptcy Procedure 2002 and also includes, without limitation, any plan of reorganization and objections thereto, notices of any orders, pleadings, motions,

applications, complaints, demands, hearings, requests for petitions, disclosure statements, answer or reply papers, memoranda and briefs in support of any of the above, and any other documents filed or served in the above-captioned chapter 11 case.

**PLEASE TAKE FURTHER NOTICE** that this Notice of Appearance and any subsequent appearance, pleading, claim or suit made or filed by the John Lymn, either individually or for any entity related to John Lymn, shall not constitute a submission by John Lymn for himself for on behalf of any other party to the jurisdiction of the Bankruptcy Court. This Notice of Appearance and any subsequent appearance, pleading, claim or suit does not, shall not and be deemed to constitute consent by John Lymn, for himself or on behalf of any other party, to entry by the Bankruptcy Court of any final order in any non-core proceeding, **which consent is hereby withheld unless, and solely to the extend, expressly granted the future with respect to a specific proceeding.** This Notice of Appearance and any subsequent appearance, pleading, claim or suit is not intended and shall not be deemed to waive any substantive or procedural rights of John Lymn or any other party, including (i) the right to have final orders in non-core matters entered only *after de novo* review by a district court judge; (ii) the right to trial by jury in any proceedings so triable herein or in any case, controversy or proceeding related hereto; (iii) the right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; (iv) the right to challenge the constitutional authority of the Bankruptcy Court to enter a final order or judgment on any matter; or (v) other rights, claims, actions, defenses, setoffs, or recoupments to which John Lymn or any other party is or may be entitled under agreements, in law or inequity, all of which rights, claims actions, defenses, setoffs and recoupments expressly are hereby reserved. This request for notice does not constitute consent to electronic service of any pleading or papers for which mailed or personal service is required under the applicable Federal or Local Rules of Bankruptcy or Civil Procedure.

FOX ROTHSCHILD, LLC

By: /s/ Mark E. Hall  
Mark E. Hall

Dated: January 20, 2023